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13 Attorneys for Defendants SIMI MANAGEMENT  
14 CORP., and STEVEN A. SIMI

15 UNITED STATES DISTRICT COURT

16 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
17 (SAN FRANCISCO DIVISION)

18 AUTOMOTIVE INDUSTRIES PENSION  
19 TRUST FUND, JAMES H. BENO, Trustee,  
20 BILL BRUNELLI,, Trustee, STEPHEN J.  
21 MACK, Trustee, MARK HOLLIBUSH,  
22 Trustee, CHRIS CHRISTOPHERSEN, Trustee,  
23 DON CROSATTO, Trustee, GEORGE HALL,  
24 JR., Trustee, CHARLES J. DI BARI, Trustee,  
25 RON NELSON, Trustee, and JAMES V.  
26 CANTERBURY, Trustee,

Case No.: C 09-02550 JCS

**STIPULATION AND PROPOSED  
ORDER REQUESTING THAT COURT  
CONTINUE DEADLINE FOR  
COMPLETING MEDIATION AND  
CASE MANAGEMENT CONFERENCE**

27 Plaintiffs,

28 v.

29 SIMI MANAGEMENT CORP., a California  
30 corporation, doing business as CONNELL  
31 AUTO CENTER, and STEVEN A. SIMI also  
32 known as ANSELMO SIMI, an Individual,

33 Defendants.

For the reasons that follow, the parties hereby jointly request that the Court continue the January 4, 2010, deadline for completing mediation and the January 14, 2010, case management conference.

4 1. This is an action under ERISA by Trustees of the Automotive Industries Pension  
5 Trust Fund to recover withdrawal liability from the defendants. The Court has set the following  
6 case management dates:

(1)	Completion of mediation:	1/4/11
(2)	Further Case Management Conference:	1/14/11
(3)	Disclosure of identities and reports of expert witnesses:	2/11/11
(4)	Completion of Fact and Expert Discovery:	3/18/11
(5)	All case-dispositive motions to be heard at 9:30 a.m. on or before:	4/22/11
(6)	Final Pretrial Conference at 1:30 p.m. on:	7/22/11
(6)	Trial will begin at 8:30 a.m. on:	8/15/11

15        2.        The Court's ADR Unit has advised plaintiffs' counsel that it cannot locate a  
16 mediator who could complete the mediation by the Court's deadline of January 4, 2011, but would  
17 have a better chance of finding a mediator if the parties could arrange for a 30 day extension of the  
18 deadline. Accordingly, the parties stipulate and jointly request that the Court continue the deadline  
19 for completing mediation from January 4, 2011, to February 3, 2011, and the post-mediation Case  
20 Management Conference from January 14, 2011, to February 18, 2011, with an updated joint Case  
21 Management Conference Statement due on February 22, 2011.

23 Dated: December 7, 2010 SALTZMAN & JOHNSON LAW CORPORATION

By: \_\_\_\_\_ /S/  
Anne M. Bevington  
Attorneys for Plaintiffs

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1 Dated: December 7, 2010

KAY & MERKLE, LLP

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By: \_\_\_\_\_ /S/  
Douglas A. Marshall  
Attorneys for Defendants

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## ORDER

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The parties having stipulated, and good cause appearing therefor,

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IT IS HEREBY ORDERED as follows:

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(1) The deadline for completing mediation, previously set for January 4, 2011, is extended to February 3, 2011;

(2) The Case Management Conference previously set for January 14, 2011, is continued to Friday, February 18, 2011, at 1:30 p.m.;

(3) An updated joint case management conference statement shall be due by February 11, 2011.

IT IS SO ORDERED.

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